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October 14, 2021

To: The Honorable Richard K. Eaton
United State District Court Judge
Southern District of New York
500 Pearl Street - New York NY, 10007

Re: Weiss Haus v. Port Authority, et al. 11-cv-6616 (RKE)

Dear Judge Eaton,

I am plaintiff and submit this letter regarding the current discovery schedule. (ECF 126, 135).

On September 2, 2021, the Court adjusted the discovery schedule, directing the filing of subpoenas of additional Port Authority witnesses whom Plaintiff intends to depose should be issued by October 15, 2021, designation of expert witness(es) by either party by November 15, 2021, and all fact discovery to be completed by December 15, 2021. (ECF 126).

On October 7, 2021, the Court ordered that the Port Authority produce the expenses of the capital expenditures by November 8, 2021. (ECF 135).

I request that the Court adjust the discovery schedule to extend the time to subpoena witnesses and designate experts for a suitable time after the Port Authority produces all the outstanding records.

Under the current schedule, Plaintiff is unable to properly choose all the topics necessary for the 30(b)(6) witness by October 15, 2021, since this discovery is fact based and requires having the necessary documents before designating the facts for a 30(b)(6) examination.

Wherefore, I ask the Court to adjust the discovery schedule with a 30-day enlargement of time for subpoenaing witness, as well designating experts and concluding fact discovery.

Respectfully submitted,

/s/ Yoel Weiss Haus

Cc: Kathleen G. Miller for the Port Authority, by ECF